

EXHIBIT 1
REDACTED VERSION OF
DOCUMENT
FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

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HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF RADU RADUTA

SAN FRANCISCO, CALIFORNIA

THURSDAY, JULY 13, 2017

REPORTED BY:

ANDREA M. IGNACIO,

CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2654630

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1 alignment bonding equipment. 13:38

2 There's [REDACTED] which is a consulting 13:38
3 company that -- that I knew that, I think, ended up 13:38
4 getting the contract to build this subsequent version 13:38
5 of this tool. 13:38

6 And then there was a company, whose name I 13:38
7 forget, that was brought on by [REDACTED] 13:38
8 Corporation. [REDACTED] was beginning to build these 13:38
9 assemblies, and they wanted one of their 13:38
10 subcontractors to bid on building this tool. And I 13:38
11 forget the name of that company, unfortunately. I'm 13:38
12 sorry. 13:38

13 Q Did you -- when you -- 13:38

14 A I think -- I think these are the four. 13:38

15 Q Sure. Thank you. 13:38

16 When you shared this document, or a form of 13:38
17 this document with outside vendors, did you do so 13:38
18 under a nondisclosure agreement? 13:38

19 A Yes. We had nondisclosure agreements with 13:38
20 all the vendors we worked with, as far as I know. 13:38

21 Q So with [REDACTED], and 13:38
22 [REDACTED], there were nondisclosure agreements in 13:39
23 place with each of them? 13:39

24 A I'm pretty sure there -- there must have 13:39
25 been, yeah. 13:39

1 Q When you say "there must have been," what do 13:39
2 you mean by that? 13:39

3 A I mean, we wouldn't have -- I think if -- we 13:39
4 wouldn't have shared any specific -- anything but very 13:39
5 general, vague information without a nondisclosure 13:39
6 agreement. 13:39

7 So I -- we might have -- the only one that 13:39
8 I -- that there is a question about is [REDACTED] And 13:39
9 in case they didn't have an NDA already with Google -- 13:39
10 you know, there's a database that shows all the NDAs 13:39
11 that exist. 13:39

12 I'm not sure if they -- if -- because that 13:39
13 one was only a short conversation, we might have only 13:39
14 given them the outline rather than specifics. Like, 13:39
15 we were looking to build a tool. Can you help us? 13:39

16 And I think they said they were too busy. 13:39

17 Q Was it Waymo policy to not disclose any 13:39
18 proprietary information outside of Waymo unless there 13:39
19 was a nondisclosure agreement in place? 13:39

20 A That was a Google-wide policy, yeah. 13:40

21 Q Can you think of any instance in which, to 13:40
22 your knowledge, anyone at Waymo shared Waymo 13:40
23 confidential information outside of Waymo without a 13:40
24 nondisclosure policy in place? 13:40

25 A Not specifically. No, I don't. I mean, I 13:40

1 don't know of any such -- such events. 13:40

2 Q Are you aware of the allegation in this case 13:40

3 that Mr. Levandowski downloaded 14,000 confidential 13:40

4 files from Waymo? 13:40

5 A I'm aware of that, yeah. 13:40

6 Q Based on what you know today, do you believe 13:40

7 that he downloaded those files? 13:40

8 A I -- I have heard or read about forensic 13:40

9 evidence that -- that shows that's the case, and I 13:40

10 have no reason to believe that that was made up. 13:40

11 Q Do you -- when you were at Waymo, were you 13:40

12 familiar with the SVN repository? 13:40

13 A I know what a SVN repository is. I was not 13:41

14 familiar with the SVN repository, if there was a SVN 13:41

15 repository. 13:41

16 Q So, you did not have access to that SVN 13:41

17 repository, as far as you know? 13:41

18 A No. 13:41

19 Let me offer that as far as I know, SVN 13:41

20 repositories at Google are only used to store 13:41

21 electrical layout, like, board files, because those 13:41

22 don't go -- there -- it's easier to keep in versions. 13:41

23 And they don't go well into the standard code 13:41

24 repository that we use for everything else. 13:41

25 Q I want to go back to around the time that you 13:41